

KALPANA SRINIVASAN (S.B. #237460)
SUSMAN GODFREY L.L.P.
1901 Avenue of the Stars, Suite 950
Los Angeles, California 90067-6029
Telephone: 310-789-3100
Facsimile: 310-789-3150
ksrinivasan@susmangodfrey.com

BARRY BARNETT (Pro Hac Vice)
SUSMAN GODFREY L.L.P.
901 Main Street, Suite 5100
Dallas, Texas 75202
Telephone: 214-754-1900
Facsimile: 214-754-1933
bbarnett@susmangodfrey.com

Attorneys for Plaintiff
AMERICAN NAVIGATION SYSTEMS, INC.

*[Additional Counsel list on Signature
Page]*

MAX L. TRIBBLE, JR. (Pro Hac Vice)
JOSEPH S. GRINSTEIN (Pro Hac Vice)
SUSMAN GODFREY L.L.P.
1000 Louisiana, Suite 5100
Houston, Texas 77002
Telephone: 713-651-9366
Facsimile: 713-654-6666
mtribble@susmangodfrey.com
jgrinstein@susmangodfrey.com

PATRICK C. BAGEANT (Pro Hac Vice)
SUSMAN GODFREY L.L.P.
1201 Third Avenue, Suite 3800
Seattle, WA 98101-3000
Telephone: 206-516-3880
Facsimile: 206-516-3883
pbageant@susmangodfrey.com

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMERICAN NAVIGATION SYSTEMS,
INC.,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC., and SAMSUNG
TELECOMMUNICATIONS AMERICA,
LLC,

Defendants.

Case No. 3:14-cv-05298-JST

STIPULATION AND ~~PROPOSED~~
ORDER SUPPLEMENTING THE
JOINT CASE MANAGEMENT
STATEMENT

Pursuant to the Court's Order (D.I. 101), Plaintiff American Navigation Systems, Inc. ("AmNav") and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively "Samsung")¹ hereby submit this stipulation and proposed order supplementing the parties' Joint Case Management Statement (D.I. 91).

WHEREAS AmNav alleges that both Samsung and Apple Inc. ("Apple") infringe the same patent, U.S. Patent No. 5,902,347 (the "'347 Patent"), in two cases captioned *American Navigation Systems, Inc. v. Apple, Inc.*, 3:14-cv-05297-JST ("Apple-AmNav case") and *American Navigation Systems, Inc. v. Samsung Electronics Co., Ltd., et. al.*, 3:14-cv-05298-JST ("Samsung-AmNav case"); and

WHEREAS the Court has ordered the parties to file a statement by March 18, 2015, informing the Court if they agree to have ten common terms construed in total for both the AmNav-Samsung and AmNav-Apple cases (in compliance with the ten-term limit in the local patent rules) or to set a telephonic case management conference for March 25, 2015 at 4:00 p.m. if the parties could not file the statement (D.I. 101).

IT IS HEREBY STIPULATED AND AGREED that, pursuant to the Court's order (D.I. 101), the parties will construe a total of ten common claim terms (or less) of the '347 Patent across both the AmNav-Samsung and AmNav-Apple cases, that the parties will have a single claim construction hearing for both cases, and that the March 25, 2015 telephonic case management conference is vacated.²

¹ According to its Supplemental Corporate Disclosure Statement (D.I. 69), Samsung Telecommunications America LLC merged into Defendant Samsung Electronics America, Inc. as of January 1, 2015, and no longer exists as a separate entity.

² Apple and AmNav are filing a substantively identical stipulation and proposed order in their case.

1
2 Dated: March 16, 2015

Dated: March 16, 2015

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4 By: /s/ Barry Barnett

By: /s/ David Almeling

5 KALPANA SRINIVASAN (S.B. #237460)
6 SUSMAN GODFREY L.L.P.
7 1901 Avenue of the Stars, Suite 950
8 Los Angeles, California 90067-6029
9 Telephone: 310-789-3100
10 Facsimile: 310-789-3150
11 ksrinivasan@susmangodfrey.com

MICHAEL K. PLIMACK (S.B. #133869)
mplimack@cov.com
CHRISTINE S. HASKETT (S.B. #188053)
chaskett@cov.com
COVINGTON & BURLING LLP
One Front Street
San Francisco, CA 94111
Ph: (415) 591-6000
Fax: (415) 591-6091

12 BARRY BARNETT (Pro Hac Vice)
13 SUSMAN GODFREY L.L.P.
14 901 Main Street, Suite 5100
15 Dallas, Texas 75202
16 Telephone: 214-754-1900
17 Facsimile: 214-754-1933
18 bbarnett@susmangodfrey.com

DARIN W. SNYDER (S.B. #136003)
dsnyder@omm.com
DAVID S. ALMELING (S.B. #235449)
dalmeling@omm.com
MARK LIANG (S.B. #278487)
mliang@omm.com
O'MELVENY & MYERS LLP
Two Embarcadero Center, 28th Floor
San Francisco, California 94111-3823
Tel: (415) 984-8700 Fax: (415) 984-8701

19 MAX L. TRIBBLE, JR. (Pro Hac Vice)
20 JOSEPH S. GRINSTEIN (Pro Hac Vice)
21 SUSMAN GODFREY L.L.P.
22 1000 Louisiana, Suite 5100
23 Houston, Texas 77002
24 Telephone: 713-651-9366
25 Facsimile: 713-654-6666
26 mtribble@susmangodfrey.com
27 jgrinstein@susmangodfrey.com

MISHIMA ALAM (S.B. #271621)
malam@omm.com
O'MELVENY & MYERS LLP
1625 Eye Street, NW
Washington, DC 20006
Tel: (202) 383-5300 Fax: (202) 383-5414

28 PATRICK C. BAGEANT (Pro Hac Vice)
SUSMAN GODFREY L.L.P.
1201 Third Avenue, Suite 3800
Seattle, WA 98101-3000
Telephone: 206-516-3880
Facsimile: 206-516-3883
pbageant@susmangodfrey.com

Attorneys for Defendants
SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC.

Attorneys for Plaintiff
AMERICAN NAVIGATION SYSTEMS, INC.

ATTORNEY ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from each of its signatories.

Dated: March 16, 2015

By: /s/ David Almeling
David Almeling

CASE MANAGEMENT ORDER

The above STIPULATION AND PROPOSED ORDER SUPPLEMENTING THE
JOINT CASE MANAGEMENT STATEMENT is Approved and all parties shall comply with
its Provisions.

IT IS SO ORDERED.

Dated: March 17, 2015

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